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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

MEI-FANG LISA ZHANG, BAY AREA
AFFORDABLE HOUSING, LLC, XUE-
HUAN GAO, YANG-CHUN ZHANG,
CAROL JIAN DENG, and HAO LIANG,

Plaintiffs,

vs.

WEI-MAN RAYMOND TSE, RUN PING
ZHOU a.k.a. FLORA ZHOU, THERESA
WONG, JAMES YU, BILL SHU WAI MA,
MOLLY LAU, VICTOR SO, JIAN XIAO,
CHRIST INVESTMENT SERVICE INC.,
CIS SERVICE, INC., PACIFIC BEST
GROUP LTD. a.k.a. PACIFIC BEST
COMPANY LTD., and SOUTH CHINA
INVESTMENT INC.,

Defendants.

Case No.: C-07-04946 JSW
(Related to C-05-02641 JSW)

**PLAINTIFFS' REQUEST FOR ENTRY
OF DEFAULT AGAINST DEFENDANT
MOLLY LAU UNDER FED. R. CIV. P.
55(a)**

Pursuant to Fed. R. Civ. P. 55(a), Plaintiffs hereby apply for the entry of a default by the Clerk against Defendant Molly Lau. The Court, in its minute order of April 11, 2008, ordered the Clerk to "enter default against all defendants except Run Ping Zhou." Order of April 11, 2008 (docket no. 59). A copy of the Court's order is attached as Exhibit "A" to the Declaration of Stephen S. Wu filed herewith in support of this Request ("Wu Declaration").

1 On April 14, 2008, the Clerk did in fact file a notice of entry of default against
2 Defendants Theresa Wong, James Yu, Bill Shu Wai Ma, Victor So, Jian Xiao, Christ Investment
3 Service Inc., CIS Service, Inc., Pacific Best Company Ltd., and South China Investment Inc.
4 Notice of Entry of Default (Apr. 14, 2008) (docket no. 60). As instructed by the Court, the Clerk
5 did not include Run Ping Zhou on the Notice of Entry of Default. The Clerk, however, also
6 omitted Molly Lau from the list of defendants defaulted.

7 The Court had ordered default to be taken against all Defendants other than Run Ping
8 Zhou, which included Ms. Lau. Accordingly, Plaintiffs respectfully request that the Clerk enter a
9 default against Ms. Lau.

10 In any case, the Plaintiffs filed their Complaint on September 24, 2007. Moreover, the
11 Complaint and Summons were served on Defendant Molly Lau on October 9, 2007. Under Fed.
12 R. Civ. P. 12, the Defendants must serve an Answer or other response to the Complaint within
13 twenty days from the date they were served with the Complaint and Summons. On January 2,
14 2008, however, the Court granted a 90 day stay to Ms. Lau in light of her current military
15 service. That stay expired on April 1, 2008.

16 Defendant Molly Lau's Answer or other response to the Complaint was due by April 1,
17 2008. As shown by the Cooke Declaration, as of 3 pm on Monday, June 16, 2008, Defendant
18 Molly Lau has not filed an Answer or other response to the Complaint. In addition, Plaintiffs'
19 counsel has not received from Defendant Lau an Answer or other response to the Complaint in
20 the mail, by fax, by email, or any other means.

21 For all of the foregoing reasons, pursuant to Fed. R. Civ. P. 55(a), Plaintiffs respectfully
22 request that the Clerk enter a default against Defendant Molly Lau.

23
24 Respectfully Submitted,

25 COOKE, KOBRICK, & WU LLP

26 Dated: June 16, 2008

27 /s/
28 By: _____
CHRISTOPHER COOKE
Attorneys for Plaintiffs